



State of Utah

Department of  
Environmental Quality

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*Executive Director*

DIVISION OF AIR QUALITY  
Richard W. Sprott  
*Director*

OLENE S. WALKER  
*Governor*

GAYLE F. McKEACHNIE  
*Lieutenant Governor*

DAQE-IN2481003-04

June 30, 2004

Terry Benson  
Hoyt USA  
543 North Neil Armstrong Road  
Salt Lake City, Utah 84116

Dear Mr. Benson:

Re: Intent to Approve: Correct Equipment Specifications, Salt Lake County, CDS B, NA, MAINT,  
HAPs. Project Code: N2481-003

The attached document is the Intent to Approve (ITA) for the above-referenced project. ITAs are subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any technical questions you may have on this project to Mr. Nando Meli. He may be reached at (801) 536-4052.

Sincerely,

Rusty Ruby, Manager  
New Source Review Section

RR:NM:jc

cc: Salt Lake Valley Health Department

**STATE OF UTAH**

**Department of Environmental Quality**

**Division of Air Quality**

**INTENT TO APPROVE: CORRECT EQUIPMENT  
SPECIFICATIONS**

**Prepared By: Nando Meli, Engineer**

**(801) 536-4052**

**Email: [nmeli@utah.gov](mailto:nmeli@utah.gov)**

**INTENT TO APPROVE NUMBER**

**DAQE-IN2481003-04**

**Date: June 30, 2004**

**Hoyt USA**

**Source Contact**

**Terry Benson**

**(801) 363-2990 ext 282**

**Richard W. Sprott**

**Executive Secretary**

**Utah Air Quality Board**

### *Abstract*

*Hoyt USA manufactures archery equipment and they replaced the Camouflage Paint Spray Booth with a Germat paint booth. The Camouflage paint booth was larger than the Germat paint booth and had a natural gas fired curing oven. The Germat paint booth does not have a curing oven. Hoyt USA has a parts washer in their maintenance department. The parts washer is a Kleen-Tec Model 1030, 30-gallon parts washer. Hoyt is listing the dip process tanks and two vacuum pumps for clarification. The tanks were originally included with the Camouflage Paint Process and the emissions associated with the tanks were included with the Camouflage Paint Process emissions. Hoyt USA is located in Salt Lake County, which is a nonattainment area of the National Ambient Air Quality Standards (NAAQS) for PM<sub>10</sub> and SO<sub>2</sub>, and is a maintenance area for CO and Ozone. New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations do not apply to this source. Title V of the 1990 Clean Air Act does not apply to this source. There will be no increase in emissions as a result of this modification.*

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order (AO) by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-4. A notice of intent to approve will be published in the Salt Lake Tribune and Deseret News on July 5, 2004. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing it will be held in accordance with UAC R307-401-4. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed AO conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the AO will be based upon the following conditions:

#### **General Conditions:**

1. This Approval Order (AO) applies to the following company:

##### Site Office

Hoyt USA  
543 North Neil Armstrong  
Road (4955 West)  
Salt Lake City, Utah 84116

##### Corporate Office Location

Hoyt USA  
7800 Haskell Ave.  
Van Nuys, California 91406

Phone Number (801) 363-2990

Fax Number (801) 537-1470

(818) 782-6445

(818) 994-3889

The equipment listed in this AO shall be operated at the following location:

543 North Neil Armstrong Road (4955 West) Salt Lake City, Utah 84116

Universal Transverse Mercator (UTM) Coordinate System:

4,514.6 km. Northing, 414.7 km. Easting, Zone 12, UTM Datum NAD 27

2. All definitions, terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code (UAC) Rule 307 (R307) and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401-1.
5. All records referenced in this AO which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request, and the records shall include the two-year period prior to the date of the request. All records shall be kept for a minimum period of two years.
6. Hoyt, USA shall conduct its operations of the Archery equipment manufacturing plant in accordance with the terms and conditions of this AO, which was written pursuant to Hoyt's Notice of Intent submitted to the Division of Air Quality (DAQ) on June 23, 2004 and additional information submitted to DAQ on June 23, 2004, and June 24, 2004.
7. This AO shall replace the AO (DAQE-AN2481002-02) dated May 17, 2002.
8. The approved installations shall consist of the following equipment or equivalent\*:
  - A. Paint Spray Booth with an area of less than 250 ft<sup>2</sup>.
  - B. Paint Spray Booth with an area of less than 100 ft<sup>2</sup>.
  - C. West Side Baghouse
  - D. East Side Baghouse
  - E. Cyclone
  - F. Natural Gas Fired Curing Oven
  - G. Electric Curing Oven
  - H. 55 Gallon Dip Tank
  - I. Parts washer

J. Dip Process Water Tanks

K. Vacuum Pumps

\* Equivalency shall be determined by the Executive Secretary.

### **Limitations and Tests Procedures**

9. Visible emissions from any stationary point or fugitive emission source associated with the source or with the control facilities shall not exceed 10% opacity. Opacity observations of emissions from stationary sources shall be conducted in accordance with 40 CFR 60, Appendix A, Method 9.
10. The operating parameter for the pressure drop in the baghouses shall be maintained within the range of greater than two to less than four inches of water column.
11. The owner/operator shall install, calibrate, maintain, and operate a monitoring device for the continuous measurement of the change in pressure of the gas stream through the baghouses. The monitoring device must be certified by the manufacturer. The monitoring device shall be accurate within plus or minus one inch of water gauge. Continuous recording for the monitoring device is not required. However, daily records of readings shall be maintained at least once a day.
12. The consumption limit of 5.6 million standard cubic feet of natural gas per 12-month period for the entire plant shall not be exceeded.

### **Fuels**

13. The owner/operator shall only use natural gas as a fuel in the curing ovens.

### **Volatile Organic Compound (VOC) and Hazardous Air Pollutants (HAPs) Limitations**

14. The facility shall abide by all applicable requirements of R307-325 through R307-341 for VOC sources located in an ozone maintenance area.
15. The paint spray booths shall be equipped with particulate filters, or equivalent, to control particulate emissions. All air exiting the paint spray booths shall pass through this control system before being vented to the atmosphere (outside building/operation).
16. The plant-wide emissions of VOCs and HAPs from the paint booths and associated operations shall not exceed:

**9.90 tons per rolling 12-month period for VOCs**

**5.00 tons per rolling 12-month period for all HAPs combined**

**0.32 tons per rolling 12-month period for Ethylbenzene**

**0.55 tons per rolling 12-month period for MEK**

**0.55 tons per rolling 12-month period for MIBK**

**0.95 tons per rolling 12-month period for Toluene**

**2.21 tons per rolling 12-month period for Xylene**

**0.33 tons each per rolling 12-month period for Miscellaneous HAPs  
(Methanol and Hexamethylene 1,6, Diisocyanate, etc.)**

Compliance with each/the limitation shall be determined on a rolling 12-month total. Based on the twentieth day of each month, a new 12-month total shall be calculated using data from the previous 12 months.

The VOC and HAP emissions shall be determined by maintaining a record of VOC and HAP emitting materials used each month. The record shall include the following data for each material used:

- A. Name of the VOC and HAPs emitting material, such as: paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.
- B. Density of each material used (pounds per gallon)
- C. Percent by weight of all VOC and HAP in each material used
- D. Gallons of each VOC and HAP emitting material used
- E. The amount of VOC and HAP emitted monthly by each material used shall be calculated by the following procedure:  
  

$$\text{VOC} = \frac{\% \text{ VOC by Weight}}{(100)} \times \left[ \frac{\text{Density (lb)}}{(\text{gal})} \right] \times \text{Gal Consumed} \times \frac{1 \text{ ton}}{2000 \text{ lb}}$$

$$\text{HAP} = \frac{\% \text{ HAP by Weight}}{(100)} \times \left[ \frac{\text{Density (lb)}}{(\text{gal})} \right] \times \text{Gal Consumed} \times \frac{1 \text{ ton}}{2000 \text{ lb}}$$
- F. The amount of VOC or HAP emitted monthly from all materials used.
- G. The amount of VOCs or HAPs reclaimed for the month shall be similarly quantified and subtracted from the quantities calculated above to provide the monthly total VOC or HAP emissions.

**Records & Miscellaneous**

17. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this Approval Order including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded.
18. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

Under R307-150-1, the Executive Secretary may require a source to submit an emission inventory for any full or partial year on reasonable notice.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the Division of Air Quality. The Utah Administrative Code R307 rules used by DAQ, the Notice of Intent (NOI) guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The annual emission estimations below include point source and fugitive emissions, and do not include fugitive dust, road dust, tail pipe emissions and grandfathered emissions. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for the Hoyt plant are currently calculated at the following values:

	<u>Pollutant</u>	<u>Tons/yr</u>
A.	PM <sub>10</sub> .....	5.19
B.	SO <sub>2</sub> .....	<0.01
C.	NO <sub>x</sub> .....	0.39
D.	CO.....	0.10
E.	VOC.....	9.90
F.	Total HAPs.....	5.00

The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final Approval Order.

Sincerely,

Rusty Ruby, Manager  
New Source Review Section